



## Mars Khaimov Law, PLLC

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### Via ECF

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

December 31, 2022

Re: *Toro v. The Blue Lobster LLC*  
Case No. 22-cv-7261-KPF

Dear Judge Failla:

Plaintiff's Counsel submits this letter-motion to request an adjournment of the initial pretrial conference, currently scheduled to take place on January 5, 2023. Plaintiff's Counsel is currently traveling with intermittent access to reliable telephone service. As such, Counsel requests that the conference be adjourned to February 6, 2023, or a date thereafter more convenient for the Court, as Counsel's calendar is quite full during the rest of January. Defense Counsel has also agreed to the adjournment, and this is the first time this relief is being requested. The Parties also request that the pre-conference submission deadline be extended to the week before the new conference date.

Plaintiff thanks the Court for its attention and consideration herein.

Respectfully and sincerely,

/s/ Mars Khaimov, Esq.

Cc: Brooke K. Haley, Esq.



Application GRANTED. The initial pretrial conference scheduled in this matter for January 6, 2023 is hereby ADJOURNED to 3:30 p.m. on **February 8, 2023**. The parties shall submit their pre-conference submissions on or before **February 2, 2022**.

The parties are advised that the Court will not look favorably upon further requests to adjourn this conference, which was initially scheduled for November 16, 2022, and has now been adjourned three times at the request of the parties. (Dtk. #5, 9, 11).

The Clerk of Court is directed to terminate the motion at docket entry 14.

Dated: January 3, 2023  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE